

Attorney's Docket No.: 07977/088002/US3155D1

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1, 3, 5, 31, and 32 stand rejected under 35 U.S.C. 102(a) as allegedly being unpatentable over Fu and Sasaki in view of Zhang. Claims 2, 6-18, 33, and 34 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Fu, Sasaki, Lin, and Zhang. All of these contentions are respectfully traversed, and it is respectfully suggested that the rejection does not meet the Patent Office's burden of providing a *prima facie* showing of unpatentability, for reasons set forth herein.

Zhang was apparently cited by the Patent Office to show the feature where the thickness of the first interlayer insulating film is less than one-third of the total thickness of the first and second interlayer insulating films and also to show a semiconductor layer formed over a substrate having an insulating surface.

However, it should be seen that a closer examination of Zhang shows that his anodic oxide films 107 and 108, and his silicon oxide film 110, cannot properly function as first and second interlayer insulating films. The silicon oxide film 110 is patterned into side walls 111 and 112. The anodic oxide films 107, 108, and the side walls 111, 112, are used as masks

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for ion doping (see column 10, lines 1-44). Zhang only shows a silicon oxide film 115 that can be regarded as an interlayer insulating film. For these reasons, it is respectfully suggested that Zhang does not teach or suggest that a thickness of the interlayer insulating film is less than one-third of a total thickness of the first and second interlayer insulating films as defined by claims 1, 10, and 19.

Regarding claims 6, 14, and 24, it is respectfully suggested that there is no motivation to combine Zhang with the other references. Zhang fails to teach or suggest that edges of the contact holes are rounded off, or that the contact holes have tapered shapes. Zhang does teach a semiconductor layer formed over a substrate having an insulating surface, but neither teaches these other features, nor any reason why one might modify Zhang's express teaching to provide these other features.

For all of these reasons, it is respectfully suggested that the rejection does not meet the Patent Office's burden of providing a *prima facie* showing of unpatentability. Therefore, it is respectfully suggested that all of these claims should be in condition for allowance. A formal notice to that effect is respectfully solicited.

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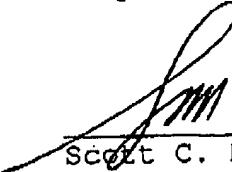
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Respectfully submitted,

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